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Voter registration

Data validation

The General Registrars (GRs) felt that voter information is checked more on the paper forms than the online forms. If there is an online form, it is assumed the information transferred from the Citizen Portal or Department of Motor Vehicles (DMV) has been entered properly, and the proper fields are filled out. If localities are transcribing voter information from a paper form into VERIS, they feel responsible for its accuracy. For NVRA compliance, they record from where the paper came.

Validating address information in voter registration data is difficult, partially because of the systems used for data validation. When an address is flagged as a commercial address, it takes a considerable amount of investigation to find out if a residential location exists at that address. If the commercial address turns out to have residential housing, the underlying data in either VERIS or the address validation system isn't updated, which ensures the issue will happen, again.

Restoration of rights

There is a manual process to restore voting rights. If VERIS flags a voter as being a felon and the voter registration application states that they are not, there are multiple actions that the GRs take:

- 1. They check VERIS and see if the person is a felon;
- 2. They look at the Secretary of the Commonwealth's website;
- 3. They call ELECT;
- 4. They look at any supporting documentation from the voter (i.e. official letter from Governor).

If these sources support reinstatement, the GR processes the application.

If there is any supporting documentation, the GRs scan any paperwork and attach it to the voter record, thereby keeping all the information in one place. The restoration of rights process is very complex and requires a significant amount of time and research. The only time there is no research required is if a voter says they are not a felon and the VERIS information agrees. The restoration of rights depends on the state's law regarding restoration of rights where felony was committed.

Part of the complexity is due to conflicting sources of information. This is a three-pronged problem among VERIS, Corrections, and the Secretary of the Commonwealth's website. The Secretary of the Commonwealth's website is the trusted source of information, but there are no real-time felon updates. The updates to the Corrections data in VERIS only happen once per month and there are times where the records are dated or conflict with the Secretary of the Commonwealth.

For Mentally Incapacitated voters, the localities get a physical letter from the clerk of court detailing the determination. Updating these records is a manual process.

Incomplete registrations

When processing registrations, the GRs have a few options on the registration screen:

- Incomplete
- Deny
- Discard Registration
- Process (accept) Registration

If the registration is marked as incomplete, the record is placed into the Incomplete Hopper. The Incomplete Hopper is essentially a research hopper and the GRs have 30 days by law to deal with these.

If the registration is eventually denied, a letter is generated to send to the voter. Currently, the descriptive text produced for the denial letter in VERIS depends on the denial reason. While in every case, the GR has the opportunity to record a comment, but the comment is only transferred onto the form letter in some cases. If the registration has to be denied, comments for all denial reasons should be copied into the letter and the letter should not be solely based on the predefined denial choices.

Incomplete registrations can be generated by both the DMV and the Citizen Portal. This is frustrating to the GRs as incomplete registrations should not be allowed to come through digital channels under the control of state agencies. The forms that collect the information should have required fields and prevent the eligible voter from providing incomplete information.

Hopper processing

Paper OVR Hopper

The Paper OVR Hopper is unnecessary in practice. The Paper OVR Hopper populates with all the incomplete online registrations, but, when the completed paper form shows up by mail (if it shows up at all), the GRs first do a search in VERIS to check if the voter is currently registered. This search doesn't bring up the Paper OVR record, so the GRs often don't realize the record exists. In this situation, for new registrations, the GRs manually (re)enter the information into VERIS, so all of the potential time-saving in having the electronic record is lost.

General hopper issues

One of the biggest pain points of the hoppers is the way it forces an inefficient workflow. When processing hopper items, VERIS doesn't go back to the list of hopper items or the next item. VERIS sends the user back to the home screen forcing them to go back through the same process every time to get to the next hopper.

Document scanning

VERIS has a 5MB upload restriction which limits the number of documents or alpha cards (i.e. voter registration forms) that can be uploaded (10-20 forms). Locality scans in grayscale, 200 dpi to keep the file size small while still retaining quality. ELECT does not provide any guidance for scanning. The current file format/size is too wasteful. Process is:

- Batch scan (either through scanning to file and uploading or scanning to VERIS)
- Capture the signature
- Files are placed into an image hopper
- Search for the voter
- Associate the document with the voter

ELECT should eliminate and archive JPEGs, TIFFs and other files that take up space on the VERIS servers and add time to processing.

Alpha Cards (Voter Registration Cards) are the original paper applications that the GRs must save for all voters. In the beginning, when these were first scanned into VERIS, they had no size restrictions as they were outputting TIFFs. They could upload 20 Mb files, but now every file has a 5 Mb size restriction. The files are grayscale with 200 DPI resolution. A GR or staff member can scan directly onto their computer or directly into VERIS, but many choose to scan directly onto their computer because, if the batch gets rejected for being over the size limit, the whole batch will need to be rescanned, not just the offending file, which the GRs find both frustrating and a waste of time.

Absentee

Absentee ballot request can be received through the portal, mail, fax, email, or in-person. Absentee ballot request requires:

- Last-4 of the SSN,
- Reason code, and,
- A phone number (to fix issues).

The phone number may not be required, but is very desirable to the GRs.

VERIS does a reasonable job of keeping track of the various absentee applications. One improvement would be for pending voter registration requests, which VERIS hides to speed up overnight processes during the close of books. VERIS could show the voter registration application requests that are hidden, which would allow the GRs to deal with the requests in piecemeal rather than a huge load, postelection.



Military voters can register and vote the same day. The state absentee form¹ causes some problems as some voters elect to receive their ballot by email or fax when they're ineligible.

Some absentee request forms exist that do not collect the last-4 of the SSN requirement and also don't contain fields to collect mailing address. These forms were developed for walk-in absentee requests where the voter was present. These forms, if mailed in, would be recorded within VERIS and denied. Some GRs stopped using them due to voter confusion and administrative overhead reasons.

If an application comes in through the Citizen Portal, it comes in via the OAB hopper. VERIS generally does a reasonably good job tracking all of the FPCAs and Virginia-specific absentee applications with date and time stamps.

No-excuse, in-person absentee voting goes into effect in 2020 two Saturdays before the presidential election. VERIS does not currently support the necessary procedures around this method of voting. Since there is no current real-time access to VERIS, people could vote in locality offices and satellites very easily.

Election Management

For the GRs who have done it before, the referenda process flows smoothly, but because local referenda happen so rarely, the process usually requires a refresher every time. This is where a video walkthrough would be of great help.

Locals would like the state to scan in documents (e.g. voter registration forms, mentally incapacitated) rather than sending a packet by mail weekly to each locality, especially since the packets are not specific to the locality. Once a document is scanned into VERIS, it is the legally-recognized document and the original can be destroyed. The packets include voter registration forms, cancelations from other states, mental incapacitation forms, and other registration-related documents. Elect could create another hopper specific to the locality. This would save them money on postage.

Ballot proofing

The ballot generation process is rather involved. The ballot information is sent to the printer in the form of a ballot report PDF generated by VERIS. The printer sends a PDF proof back to the GRs. The GRs have to upload the PDF to the state through FormSite. The state then ensures the ballot information is correct according to state law. If not, it has to work its way back to the GR, who informs candidates, if necessary, and edits the VERIS data, and then sends back the amended report to the ballot printer to fix.

¹ https://www.elections.virginia.gov/media/formswarehouse/Absentee-Voting/Applications/SBE-701-Absentee-Ballot-Application-Rev7-17-long.pdf



The first candidate that submits 125 signatures is at the top of the ballot for the given office, regardless of whether or not a significant number of the signatures are invalid, as long as they finally qualify by the required date. VERIS provides the order of the offices on the ballot, since it's determined by state law.

VERIS should be able to track the date and time a petition pages was received and track the number of valid signatures. VERIS should also provide an alert when a petition has achieved the required number of accepted signatures.

Candidate management

Candidates come in and file in person. The process looks like:

- File a notarized certificate of candidate qualifications
- File a notarized declaration of candidacy
 - Almost the exact same as the candidate qualifications form with the difference being how the candidate wants their name to appear on the ballot
 - The candidate's name has to largely match their voter registration record
- File a notarized petition, which must be filed at the same time as the declaration of candidacy
 - Petition signatures have to personally be witnessed by the petition circulator

In VERIS, on a master petition page, the GRs have to enter all the information of the candidate that is on the declaration of candidacy, as well as how many pages were originally submitted and how many available signatures are on each page (either 12 or 21). This creates the petition pages. On the individual petition pages the GR has to enter —name, address, date, and, optionally, the last-4 of the SSN—on each line, including the empty lines on the physical page. More pages can be added within a window of time determined by state law, even if the candidate has reached the required number of signatures. Searching for each signature involves a grueling process of searching every permutation of the signer's name, address, and last-4 of the SSN, if it exists, to find out if the signer is a valid signer. You must also search your election district (if applicable), locality, and the state so that you are able to mark the voter in an appropriate way (i.e. registered, not registered, registered not qualified)

The only thing a candidate can do online is campaign finance, but everything else requires a trip to the GR's office.

Election night results

If all localities are reporting their results at the same time on election night, there are overloaded servers and delays. In many reporting areas of VERIS, even though there are fields prepopulated with zeros, the election official must enter a "new zero" in place of the pre-populated zero or they get called by ELECT as not adding a "new zero" makes the report show as incomplete in that field.



Correspondences

Generating correspondences can be problematic. For example, when denying a registration, the denial screen allows you to submit additional comments, but there are a number of default categories (e.g. Residency, other) where the comment isn't transferred to the letter. It's also unclear if there is there a limit to the number of characters GRs can put in the comment. In some cases, the missing comment information can lead to court time for the GRs (e.g. the GRs have to go to court to relay the reason for rejecting an application, which would have been provided by the missing comment).

Address management

Without GIS, the GRs said they often have errors as a result when dealing with address management. Managing street segments is complicated, clunky, and error-prone. This also makes redistricting a very time-consuming process.

Security

IT management

Some localities whitelist their own IP addresses and serve as their own IT resources/departments. They receive emails from the ISACs and try and do what is needed to comply with the recommended security best practices, but this work is already on top of a demanding job.

Authentication

There are three different ways to handle Two-Factor Authentication (2FA) for VERIS—email, phone call, or an authenticator application. Where 2FA becomes taxing, the VERIS session time-out period seems very arbitrary, which requires certain users to call in for another 2FA token. The GRs mentioned they also do not like that they have to use their personal devices for the 2FA authenticator app. This takes up personal phone memory and feels inappropriate to them. The only reason some GRs agree to use their personal phones is that election security is protected from FOIA and the email and phone options are potentially insecure and onerous, respectively.

Roles and responsibilities

With regard to roles and responsibilities, GR staffers in small offices often need full administrative access to VERIS. Small offices require that every employee needs to do every potential task. All GR staff members at these three localities have full access and permissions for all roles. GRs need the ability to grant administrative access without calling ELECT.

Physical security

Many localities have no badges, no deadbolts on the single main door, and no cameras. The main door may also be surrounded by large glass windows making it less of a deterrent. Cybersecurity is only one



aspect of overall security. Unfortunately, the GRs don't know who should be responsible for this physical security budget items and where the money should come from. The GRs feel that there is little attention paid to the physical security of the GR offices by the counties. While this topic is indirectly related to VERIS, there is informational value worth notating.

Performance and system stability

The localities expressed that VERIS has issues handling traffic. It crashes a lot especially in the following areas: election night reporting, online voter registration (in the days leading up to close of books), absentee voting, and uploading reports. The Citizen Portal should be decoupled from VERIS so there is less "drag" on the overall system. When all localities are attempting to report result at the same time on Election Night, this is where the issue shows up. Additionally, when there are many localities uploading scanned documents at the same time, there are significant performance issues.

Virginia-specific solution

VERIS was not built with Virginia's election laws and processes. VERIS, at its core, was built for Indiana and does not fully capture the unique needs of Virginia and its localities. The GRs want a system built specifically for Virginia election officials.

The new system should focus on precincts rather than congressional districts as the latter are only useful if congressional races are on the ballot for the upcoming election. Otherwise, the congressional districts are distracting.

VERIS update issues

They all expressed that they do not like the fact that patches are not done on a set schedule, and that patches often happen during election critical times (i.e. absentee season). More notice—more than one day—of when the changes are to be made would be nice. They do however do a good job of explaining the changes that were made. Often after the update, the changes affect other areas that were not anticipated, which usually impacts the ability for the GRs to do their job.

Election-day default

When an election official is processing candidates, the election date should show as the election taking place next not defaulting to a past election. For example, currently, VERIS defaults to the June 2019 primary rather than the November 5, 2019 election. This leaves room for potential errors.



VERIS step-by-step guides

In the past, these guides were constantly out-of-date and confusing. The guides are much better now, but still need significant improvement. They need to be updated regularly and videos are necessary, especially for new GRs. Training sessions should be recorded and videotaped and tailored to the audience (i.e. new registrars should have different training materials than veteran registrars). While the GRs felt these training materials should be accessible on a self-contained site separate from VERIS, they should not be added to the current system due to potential system slowdown.

Forms warehouse

The Forms Warehouse application is missing critical functions to be useful. The GRs felt a search function was crucial for the application to be usable. New GRs have no idea what information is in the Warehouse or how to find what they need.

More comprehensive system

While VERIS has large number of features, the GRs noted VERIS is not a comprehensive solution. Multiple programs are used by the localities that really need to be integrated into VERIS. It is time consuming to switch from program to program to accomplish a particular task. For example, photo IDs require a separate program. The same applies to pollbooks.

Miscellaneous

COMET

In a passing comment, one GR mentioned the COMmittee Electronic Tracking (COMET) application "never works." Though there was no time to dive into this statement, it seemed important to capture.

Future state

Built for Virginia

All administration in VERIS is by congressional district, which may have made sense for Indiana, but ends up being cumbersome for administration in Virginia. The system should be centered around the voter.

Responsive and stable

The GRs envision a system that can handle the traffic around and on election day. The system should also be decoupled from the Citizen Portal and any reporting system. For example, if the Citizen Portal or the ENR system goes down, it shouldn't affect VERIS.



Funds for physical security

Some offices rarely have the physical security they need to secure their offices. For example, some offices lack deadbolts to the only door into the office. While that one expense may seem trivial, some offices lack the budget for even small changes. While this topic is indirectly related to VERIS, there is informational value worth notating.

Better reporting system

GRs have specific questions they would like answer by the data in VERIS, but often only have access to canned reports. A more flexible reporting system would be extremely helpful.

Greater administrative access

GRs would like the ability to grant administrative rights to their staff without having to call ELECT. The GRs are fine with ELECT creating and vetting the user, but the GRs should be able to change user privileges, to keep in line with least privilege, since user responsibilities can change from day to day.

Default election

The election you want to work on becomes default without the need to reset it or worry about it resetting itself.

Data uploads

In some jurisdictions, the GRs are using Google Sheets for certain types of data collection. The new system should allow locals to submit the data in a specific format and the format should be standardized and the process streamlined.

GIS

GIS needs to be integrated into the system. Currently, VERIS has street files, which is based on USPS data and assumed to be accurate. In addition to VERIS using GIS, the DMV should be using it too as DMV registration applications often have incorrect street names.

ePollbook access to VERIS

Since the state is moving to no-excuse, in-person absentee in 2020, there needs to be faster, real-time access to VERIS. At a minimum, VERIS should allow for voter credit uploads every evening from pollbooks during the early voting period.

Better interagency cooperation

Many of the pain points for VERIS lie in the lack of real-time information from other agencies. For example, regarding restoration of rights:

- Corrections data seems to be years out of date
- Local registrars have to check on restoration of rights and restore the rights



• Secretary of the Commonwealth's restoration page may also be out of date (i.e. there are sometimes new felony convictions since restoration)

These issues apply to other agencies, as well. DMV should be only passing on valid registrations and the courts data could be ingested directly into VERIS rather than through a paper process.

Better education

VERIS has a massively steep learning curve and while the future system should be easier to use and understand, the system education could be much better. So much of the current system education is through trial-by-fire and knowledge sharing between GRs, the latter of which increases the burden on the GRs. Help should be built into the system though step-by-step guides, cheat sheets, and online webinars and videos. These resources should be governed by a content management plan, regularly audited for accuracy, and be kept up-to-date.